

STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.

Valuation of Security Assumption of Executory Contract or Unexpired Lease Lien Avoidance

Last revised: August 1, 2020

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re: Case No.: 19-25000
Lina C. Granada Judge: JKS

Debtor(s)

Chapter 13 Plan and Motions

☐ Original ☒ Modified/Notice Required Date: August 12, 2020
☐ Motions Included ☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE

YOUR RIGHTS MAY BE AFFECTED

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☒ DOES ☐ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney: RLL Initial Debtor: LCG Initial Co-Debtor:

Part 1: Payment and Length of Plan

a. The debtor shall pay \$ \$250.00 per month to the Chapter 13 Trustee, starting on September 1, 2019 for approximately 60 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

☒ Future earnings

☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: _____

☐ Refinance of real property:

Description:

Proposed date for completion: _____

☒ Loan modification with respect to mortgage encumbering property:

Description: 263 Hillcrest Avenue Wood Ridge, NJ 07075

Proposed date for completion: March 2021

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e. ☐ Other information that may be important relating to the payment and length of plan:

Part 2: Adequate Protection ☐ NONE

a. Adequate protection payments will be made in the amount of \$ _____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to _____ (creditor).

b. Adequate protection payments will be made in the amount of \$ 1,801.24 to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: JPMorgan Chase Bank, N.A. (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 3,750.00
DOMESTIC SUPPORT OBLIGATION		

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:
Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☐ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Chase	263 Hillcrest Avenue Wood Ridge, NJ 07075	\$276,027.32	3.413	\$276,027.32 (Arrears to be addressed via a loan modification)	\$1,801.24

b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

c. Secured claims excluded from 11 U.S.C. 506: ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☐ **NONE**

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

**NOTE: A modification under this Section ALSO REQUIRES
the appropriate motion to be filed under Section 7 of the Plan.**

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid
Specialized Loan Servicing, LLC	263 Hillcrest Avenue Wood Ridge, NJ 07075	\$69,551.15	\$384,000.00	First Mortgage Chase - \$493,431.22	No Value	N/A	0.00

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

e. Surrender ☒ **NONE**

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt

f. Secured Claims Unaffected by the Plan ☒ **NONE**

The following secured claims are unaffected by the Plan:

g. Secured Claims to be Paid in Full Through the Plan: ☒ **NONE**

Creditor	Collateral	Total Amount to be Paid Through the Plan

Part 5: Unsecured Claims ☐ **NONE**

a. Not separately classified allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$ _____ to be distributed *pro rata*
- ☐ Not less than _____ percent
- ☒ *Pro Rata* distribution from any remaining funds

b. Separately classified unsecured claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid

b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured. ☐ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified
Specialized Loan Servicing, LLC	264 Hillcrest Avenue Wood Ridge, NJ 07075	\$69,551.15	\$384,000.00	First Mortgage Chase - \$493,431.22	- \$109,431.22	\$69,551.15

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☒ Upon confirmation
☐ Upon discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee commissions
- 2) Other Administrative Claims
- 3) Secured Claims
- 4) Priority Claims

d. Post-Petition Claims

The Standing Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification ☐ NONE

NOTE: Modification of a plan does not require that a separate motion be filed. A modified plan must be served in accordance with D.N.J. LBR 3015-2.

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: August 19, 2019.

Explain below **why** the plan is being modified:
The Plan is being modified because the debtor needs more time to complete a loan modification.

Explain below **how** the plan is being modified:
The Plan is being modified by proposing to complete a loan modification for the debtor's property by March 2021.

Are Schedules I and J being filed simultaneously with this Modified Plan?

☐ Yes

☒ No

Part 10: Non-Standard Provision(s): Signatures Required

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

Signatures

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to Local Form, *Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: August 12, 2020

/s/ Lina C Granada
Debtor

Date: _____

Joint Debtor

Date: August 12, 2020

/s/ Russell L. Low
Attorney for Debtor(s)

Certificate of Notice Page 11 of 12

United States Bankruptcy Court
District of New JerseyIn re:
Lina C Granada
DebtorCase No. 19-25000-JKS
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-2

User: admin
Form ID: pdf901Page 1 of 2
Total Noticed: 39

Date Rcvd: Aug 13, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 15, 2020.

db +Lina C Granada, 263 Hillcrest Avenue, Wood Ridge, NJ 07075-1223
cr +WELLS FARGO BANK, N.A. AS TRUSTEE FOR FREDDIE MAC, Phelan Hallinan & Schmieg, PC,
1617 JFK Boulevard, Suite 1400, Philadelphia, PA 19103-1814
518386935 +AMEX DSNB, 9111 DUKE BLVD, MASON, OH 45040-8999
518386936 +AMEXDSNB, 9111 DUKE BLVD, MASON, OH 45040-8999
518451589 American Express National Bank, c/o Becket and Lee LLP, PO Box 3001,
Malvern PA 19355-0701
518386938 +BK OF AMER, 4909 SAVARESE CIR, TAMPA, FL 33634-2413
518474574 Capital One, N.A., c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
518386947 +DSNB BLOOM, 9111 DUKE BLVD, MASON, OH 45040-8999
518386948 +DSNB MACYS, PO BOX 8218, MASON, OH 45040-8218
518472808 +PNC BANK N.A., PO BOX 94982, CLEVELAND, OH 44101-4982
518386951 +PNC Mortgage, PO Box 8703, Dayton, OH 45401-8703
518386952 +Powers Kirn, LLC, 728 Marne Highway, Suite 200, Moorestown, NJ 08057-3128
518547195 +Specialized Loan Servicing LLC, 8742 Lucent Blvd, Suite 300,
Highlands Ranch, Colorado 80129-2386
518547196 +Specialized Loan Servicing LLC, 8742 Lucent Blvd, Suite 300,
Highlands Ranch, Colorado 80129, Specialized Loan Servicing LLC,
8742 Lucent Blvd, Suite 300, Highlands Ranch, Colorado 80129-2386
518386957 +Tucker & Arsenberg, P.C., Jordan S. Blask, Esq., 1500 One PPG Place,
Pittsburgh, PA 15222-5416

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: usanj.njbankr@usdoj.gov Aug 14 2020 00:12:49 U.S. Attorney, 970 Broad St.,
Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
smg +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Aug 14 2020 00:12:44 United States Trustee,
Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,
Newark, NJ 07102-5235
cr +E-mail/PDF: EBN_AIS@AMERICANINFOSOURCE.COM Aug 14 2020 00:22:08
BMW Financial Services NA, LLC Department, C/O AIS, 4515 N Santa Fe Ave, Dept. APS,
Oklahoma City, OK 73118-7901
cr +E-mail/PDF: gecsedirecoverycorp.com Aug 14 2020 00:21:42
Synchrony Bank c/o PRA Receivables Management, LLC, PO BOX 41021, Norfolk, VA 23541-1021
518386937 +E-mail/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM Aug 14 2020 00:12:30 ANNIE SEZ,
401 HACKENSACK AVE, HACKENSACK, NJ 07601-6411
518386939 E-mail/PDF: ais.bmw.ebn@americaninfosource.com Aug 14 2020 00:21:53 BMW FINANCIAL SERVICES,
5515 PARKCENTER CIR, DUBLIN, OH 43017
518460216 E-mail/PDF: ais.bmw.ebn@americaninfosource.com Aug 14 2020 00:21:07
BMW Financial Services NA, LLC, P.O. Box 3608, Dublin, OH 43016
518402078 +E-mail/PDF: acg.acg.ebn@americaninfosource.com Aug 14 2020 00:22:41
BMW Financial Services NA, LLC, AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS,
Oklahoma City, OK 73118-7901
518386943 +E-mail/PDF: AIS.cocard.ebn@americaninfosource.com Aug 14 2020 00:22:40 CAPITAL ONE,
PO BOX 30253, SALT LAKE CITY, UT 84130-0253
518386941 E-mail/PDF: AIS.cocard.ebn@americaninfosource.com Aug 14 2020 00:22:39 CAPITAL ONE,
15000 CAPITAL ONE DR, RICHMOND, VA 23238
518406573 +E-mail/PDF: EBN_AIS@AMERICANINFOSOURCE.COM Aug 14 2020 00:22:08
Capital One Bank (USA), N.A., 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
518386945 E-mail/PDF: ais.chase.ebn@americaninfosource.com Aug 14 2020 00:22:37 CHASE CARD,
PO BOX 15298, WILMINGTON, DE 19850
518386944 E-mail/PDF: ais.chase.ebn@americaninfosource.com Aug 14 2020 00:22:37 Chase,
PO Box 469030, Denver, CO 80246
518506781 E-mail/PDF: ais.chase.ebn@americaninfosource.com Aug 14 2020 00:22:37
JPMorgan Chase Bank, National Association Et.Al., Chase Records Center,
Attn: Correspondence Mail, Mail Code LA4-5555, 700 Kansas Lane, Monroe LA 71203
518386949 +E-mail/Text: PBNCNotifications@peritussservices.com Aug 14 2020 00:12:01 KOHLS/CAPONE,
N56 W 17000 RIDGEWOOD DR, MENOMONEE FALLS, WI 53051-7096
518407274 E-mail/PDF: resurgentbknnotifications@resurgent.com Aug 14 2020 00:21:59 LVNV Funding, LLC,
Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
518386950 +E-mail/PDF: MerrickBKNotifications@Resurgent.com Aug 14 2020 00:22:32 MERRICK BANK CORP,
PO BOX 9201, OLD BETHPAGE, NY 11804-9001
518466012 +E-mail/Text: bankruptcydpt@mcmcg.com Aug 14 2020 00:12:44 Midland Funding LLC,
P.O. Box 2011, Warren, MI 48090-2011
518386953 +E-mail/PDF: gecsedirecoverycorp.com Aug 14 2020 00:21:42 SYNCB/LORD & TAY, PO BOX 965015,
ORLANDO, FL 32896-5015
518386954 +E-mail/PDF: gecsedirecoverycorp.com Aug 14 2020 00:21:41 SYNCB/TJX COS, PO BOX 965015,
ORLANDO, FL 32896-5015
518388913 +E-mail/PDF: gecsedirecoverycorp.com Aug 14 2020 00:22:31 Synchrony Bank,
c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
518386956 +E-mail/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM Aug 14 2020 00:12:30 TALBOTS, 175 BEAL ST,
HINGHAM, MA 02043-1512
518386958 +E-mail/Text: vci.bkcy@vwcredit.com Aug 14 2020 00:12:54 VW CREDIT INC, 1401 FRANKLIN BLVD,
LIBERTYVILLE, IL 60048-4460

District/off: 0312-2

User: admin
Form ID: pdf901

Page 2 of 2
Total Noticed: 39

Date Rcvd: Aug 13, 2020

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center (continued)

518482894 +E-mail/PDF: EBN_AIS@AMERICANINFOSOURCE.COM Aug 14 2020 00:22:08 Verizon,
by American InfoSource as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
TOTAL: 24

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

518386940* ++BMW FINANCIAL SERVICES, CUSTOMER SERVICE CENTER, PO BOX 3608, DUBLIN OH 43016-0306
(address filed with court: BMW FINANCIAL SERVICES, 5515 PARKCENTER CIR, DUBLIN, OH 43017)
518386942* ++CAPITAL ONE, PO BOX 30285, SALT LAKE CITY UT 84130-0285
(address filed with court: CAPITAL ONE, 15000 CAPITAL ONE DR, RICHMOND, VA 23238)
518386946* ++JPMORGAN CHASE BANK N A, BANKRUPTCY MAIL INTAKE TEAM, 700 KANSAS LANE FLOOR 01,
MONROE LA 71203-4774
(address filed with court: CHASE CARD, PO BOX 15298, WILMINGTON, DE 19850)
518386955* ++SYNCB/TJX COS, PO BOX 965015, ORLANDO, FL 32896-5015

TOTALS: 0, * 4, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address
pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 15, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 12, 2020 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor Gulf Harbour Investments Corporation
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Marie-Ann Greenberg magecf@magtrustee.com
Melissa N. Licker on behalf of Creditor Wells Fargo Bank, N.A. as trustee for Freddie Mac
Securities REMIC Trust, Series 2005-S001 NJ_ECF_Notices@mccalla.com,
mccallaecf@ecf.courtdrive.com
Robert Davidow on behalf of Creditor WELLS FARGO BANK, N.A. AS TRUSTEE FOR FREDDIE MAC
SECURITIES REMIC TRUST, SERIES 2005-S001 nj.bkecf@fedphe.com
Russell L. Low on behalf of Debtor Lina C Granada ecf@lowbankruptcy.com,
ecf@lowbankruptcy.com;r57808@notify.bestcase.com
Sherri Jennifer Smith on behalf of Creditor WELLS FARGO BANK, N.A. AS TRUSTEE FOR FREDDIE MAC
SECURITIES REMIC TRUST, SERIES 2005-S001 nj.bkecf@fedphe.com, nj.bkecf@fedphe.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov
William M.E. Powers, III on behalf of Creditor Wells Fargo Bank, N.A. as trustee for Freddie
Mac Securities REMIC Trust, Series 2005-S001 ecf@powerskirn.com

TOTAL: 8